

## United States District Court

SEP 13 2014

SOUTHERN

DISTRICT OF  
McALLEN DIVISION

TEXAS

David J. Bradley, Clerk

UNITED STATES OF AMERICA

V.

## CRIMINAL COMPLAINT

Juan Carlos Olvera-Quiroz      *PRINCIPAL*      Mexico  
 A202 084 814      YOB:      1993  
 Antonio Olvera-Quiroz      *CO-PRINCIPAL*      Mexico  
 A206 028 936      YOB:      1995  
 Santos Cruz-Lopez      *CO-PRINCIPAL*      Mexico  
 A205 843 685      YOB:      1996

Case Number:  
 M-14- 1796-M

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about September 12, 2014 in Hidalgo County, in the Southern District of Texas defendants(s) did,  
*(Track Statutory Language of Offense)*

knowing or in reckless disregard of the fact that Adonias Marroquin-Revolorio and Josue Mizraim Zeron-Castaneda both citizens and nationals of Guatemala and ten (10) other undocumented aliens for a total of twelve (12) who had entered the United States in violation of law, did knowingly transport, or move or attempts to transport by foot said aliens in furtherance of such violation of law within the United States, that is, from a location near Hidalgo, Texas to the point of arrest near Hidalgo, Texas.

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY  
 I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On September 12, 2014, while performing line watch duties south of Hidalgo, Texas, Border Patrol Agent apprehended a group of sixteen (16) undocumented aliens in the United States. The subjects were then transported for questioning and processing. Upon arrival to the Weslaco, Texas Border Patrol Station, the subjects OLVERA-Quiroz, Juan Carlos, OLVERA-Quiroz, Antonio, CRUZ-Lopez, Santos and M.S.C. were identified as the foot guides of the group. M.S.C. was not prosecuted due to being a minor.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Signature of Complainant

Frediberto Hernandez Senior Patrol Agent

Printed Name of Complainant

Sworn to before me and subscribed in my presence,

September 13, 2014  
Dateat McAllen, Texas  
City and StatePeter E. Ormsby, U. S. Magistrate Judge  
Name and Title of Judicial Officer

Signature of Judicial Officer

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

**M-14- 1796-M**

**RE: Juan Carlos Olvera-Quiroz  
Antonio Olvera-Quiroz  
Santos Cruz-Lopez**

**A202 084 814  
A206 028 936  
A205 843 685**

**CONTINUATION:**

Once at the Weslaco Station, principals (foot guides) OLVERA-Quiroz, Juan Carlos, OLVERA-Quiroz, Antonio, CRUZ-Lopez, Santos and material witnesses MARROQUIN-Revolorio, Adonias and ZERON-Castaneda, Josue Mizraim, were advised of their Miranda Rights in Spanish language and all subjects acknowledged they understood their rights.

**PRINCIPALS STATEMENTS:**

All three (3) principals (foot guides) OLVERA-Quiroz, Juan Carlos, OLVERA-Quiroz, Antonio, and CRUZ-Lopez, Santos were advised of their Miranda Rights and they requested an attorney before any questioning.

**MATERIAL WITNESS STATEMENTS:**

1.) MARROQUIN-Revolorio, Adonias claimed to be a citizen of Guatemala and illegally entered into the U.S. MARROQUIN stated that his family made arrangements in Guatemala to be smuggled into the U.S. He then stated that his family paid \$2,000 for his smuggling fee and that he would be taken to Houston, Texas. MARROQUIN also stated that he along with another fifteen (15) subjects to include the foot guides crossed the Rio Grande River into the U.S. Upon entry into the U.S., MARROQUIN stated he was guided by a total of four (4) foot guides. All the guides were not wearing any shirts and that they would all make hand gestures and signals telling the group where to walk, when to stop, and to stay down and be quiet. Additionally, MARROQUIN stated that the guides would take turns leading the group and that they followed them for approximately eight (8) hours. MARROQUIN identified each individual foot guide from a Department of Homeland Security approved photo lineup.

2.) ZERON-Castaneda, Josue Mizraim claimed to be a citizen of Guatemala and illegally entered into the U.S. ZERON stated that he made arrangements with an unknown subject in Guatemala to be smuggled into the U.S. He went on to say that he paid a total sum of \$6,600 U.S.D. and that he was to be taken to Houston, Texas. ZERON stated that after illegally entering the U.S. he started to follow several guides who were not wearing any shirts through the brush and that CRUZ-Lopez, Santos told him that they were going to jump over a concrete wall and then run into an abandoned house nearby. Furthermore, Zeron stated that OLVERA-Quiroz, Juan Carlos, OLVERA-Quiroz, Antonio and CRUZ-Lopez, Santos would make them carry the ladder that was utilized to get over the wall they needed to cross. ZERON also stated that once reaching the wall, OLVERA-Quiroz, Antonio used the ladder to climb and check for Border Patrol Agents. ZERON mentioned that all the foot guides would make hand gestures to give the group directions and would signal them to stay down or be quiet.